

RECEIVED

AUG 21 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 ETHAN M. POSNER (*pro hac vice*)
2 ERIC D. PHELPS (*pro hac vice*)
3 COVINGTON & BURLING LLP
1201 Pennsylvania Avenue, NW
Washington, DC 20004-2401
Telephone: 202.662.6000
4 Facsimile: 202.662.6291
Email: eposner@cov.com, ephelps@cov.com

5 GRETCHEN HOFF VARNER (State Bar No. 284980)
6 COVINGTON & BURLING LLP
One Front Street
7 San Francisco, CA 94111
Telephone: 415.591.6000
8 Facsimile: 415.591.6091
E-mail: ghoffvarner@cov.com

9 Attorneys for Defendants
10 GILEAD SCIENCES, INC. and GILEAD ALBERTA ULC

11 INGRID EVANS (State Bar No. 179094)
12 ELLIOT WONG (State Bar No. 285540)
EVANS LAW FIRM, INC.
3053 Fillmore Street, #236
13 San Francisco, CA 94123
Telephone: 415.441.8669
14 Facsimile: 888.891.4906
E-mail: ingrid@evanslaw.com

15 ANDREW S. FRIEDMAN (*pro hac vice pending*)
16 FRANCIS J. BALINT, JR. (*pro hac vice pending*)
BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.
2325 E. Camelback Road, Suite 300
17 Phoenix, Arizona 85016
Telephone: 602.274.1100
18 Facsimile: 602.274.1199
E-mail: afriedman@bffb.com, fbalint@bffb.com

19 Attorneys for Plaintiffs/Relators
20 JEFF and SHERILYN CAMPIE

21 UNITED STATES DISTRICT COURT
22 FOR THE NORTHERN DISTRICT OF CALIFORNIA

23 UNITED STATES OF AMERICA, ex rel.
24 CAMPIE *et al.*,

Civil Case No.: CV 11-941 EMC

25 Plaintiffs,

[PROPOSED] ORDER

26 vs.

FILED UNDER SEAL

27 GILEAD SCIENCES, INC., *et al.*,

28 Defendants.

[PROPOSED] ORDER

Having considered the Stipulation for Filing of Redacted Amended Complaint and Joint Response to Order to Show Cause (the "Stipulation and Joint Response") and the record in this case, the Court hereby approves the parties' stipulation and IT IS HEREBY ORDERED as follows:

1. Based on the Declaration of J. Matthew Colomb dated August 15, 2014, the Court determines that the First Amended Complaint contains information that is privileged, protectable as a trade secret or is otherwise entitled to protection under the law and that, under the circumstances presented, good cause and compelling reasons exist to seal portions of the FAC in accordance with Local Rule 79-5(b).

2. The Clerk of the Court is hereby directed to file the redacted version of the First Amended Complaint attached as Exhibit A to the Stipulation and Joint Response, making the redacted version of the document available for public inspection.

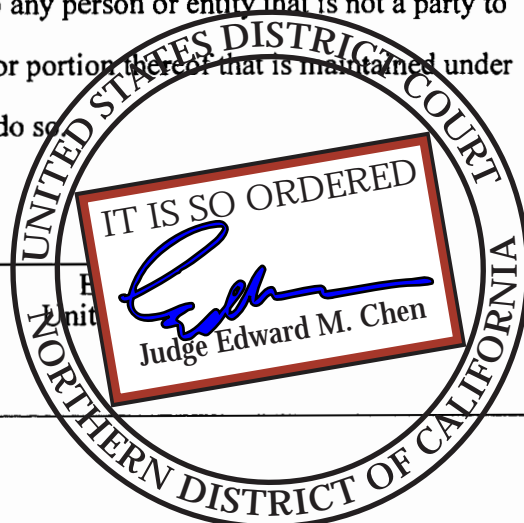
3. The Clerk of Court is further directed to unseal Defendants' Motion to Dismiss, making the document available for public inspection.

4. The Clerk of Court is further directed to unseal the Court's August 4, 2014 Order (Dkt. No. 75), making the document available for public inspection.

5. The Clerk of the Court shall maintain under seal the following documents that are already on file under seal: (a) the unredacted First Amended Complaint; (b) the original Complaint as well as the exhibits thereto; and (c) Plaintiff/Relators' Memorandum in Opposition to Motion to Dismiss, thereby keeping those documents from public inspection in accordance with the procedure set forth in Local Rule 79-5.

5. No party to this action shall publish (by electronic means or otherwise) or directly or indirectly disclose or cause to be disclosed to the public, or to any person or entity that is not a party to this action or counsel to a party to this action, any document or portion thereof that is maintained under seal, without an order from the Court granting permission to do so.

Dated: 9/9/14



PROOF OF SERVICE

STATE OF CALIFORNIA, CITY AND COUNTY OF SAN FRANCISCO

I am a resident of the United States. My business address is One Front Street, 35th Floor, San Francisco, California 94111. I am employed in the City and County of San Francisco where this service takes place. I am over the age of 18 years, and not a party to the within cause. I am readily familiar with my employer's normal business practice for collection and processing of correspondence for mailing with the U.S. Postal Service.

On the date set forth below, I served the document(s) described as:

**[PROPOSED] ORDER
FILED UNDER SEAL**

on the following person(s) in this action by placing a true copy thereof enclosed in an envelope addressed as follows:

ANDREW S. FRIEDMAN (admitted pro hac vice)
FRANCIS J. BALINT, JR. (admitted pro hac vice)
BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.
2325 E. Camelback Road, Suite 300, Phoenix, Arizona 85016
Telephone: 602.274.1100
Facsimile: 602.274.1199
E-mail: afriedman@bffb.com, fbaint@bffb.com

INGRID EVANS (State Bar No. 179094)
ELLIOT WONG (State Bar No. 285540)
EVANS LAW FIRM, INC.
3053 Fillmore Street, #236, San Francisco, CA 94123
Telephone: 415.441.8669
Facsimile: 888.891.4906
E-mail: ingrid@evanslaw.com


SARA WINSLOW
Assistant United States Attorney
U.S. Attorney's Office, N. Dist. Calif.
450 Golden Gate Ave., 9th Floor
San Francisco, CA 94102-3495
Telephone: 415.436.6925
Facsimile: 415.436.6748
E-mail: sara.winslow@usdoj.gov

☒ (BY MAIL) I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail at San Francisco, California.

☒ (E-MAIL) I caused the document(s) to be sent to the persons at the e-mail address(es) listed above.

1 I declare under penalty of perjury that the foregoing is true and correct, and that I am
2 employed at the office of a member of the bar of this Court at whose direction the service was
3 made.

4 Executed on August 21, 2014 at San Francisco, California.

5 
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Emilio J. Aguilar